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October 14, 2022

Via ECF

Honorable Naomi R. Buchwald United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

Re: Platina Bulk Carriers Pte Ltd. v. Praxis Energy Agents DMCC et al.

20-CV-04892-NRB T&N File No.: 2838

Dear Judge Buchwald:

We are attorneys for the Plaintiff in the above captioned action. With the consent of counsel for the Defendant, Praxis Energy Agents, LLC ("Praxis U.S."), we are writing to respectfully request a 90-day extension to the Case Management Plan.

The parties have agreed to a 30(b)(6) deposition of the Plaintiff as well as the deposition of the principal of Praxis U.S., Mr. Theodosios Kyriazis. Both parties have also agreed that, in the event they believe additional depositions are necessary, those depositions will proceed upon a showing of good cause. We've agreed to this reservation since neither party knows whether the witnesses will be in a position to respond to all the areas of inquiry. Because of both counsel's trial schedules, these depositions won't take place until the first two weeks of December. If additional depositions are necessary, we may be writing to the Court to seek the Court's assistance in determining whether good cause has been shown and the additional depositions warranted.

We appreciate the Court's indulgence in this regard.

Respectfully yours,

Thomas L. Tisdale